

Exhibit 2

From: [Yarm, Alexander R.](#)
To: [Magee, Jessica B \(DFW - X61375\)](#); [Ross, David E.](#); [Gottlieb, Jason](#); [Mascianica, Scott \(DAL - X62106\)](#); [Englander, Alex M \(WPB - X28339\)](#); [Balthazor, Andrew W \(MIA - X27584\)](#); [Hakob Stepanyan](#); [Daniel Burget](#)
Subject: RE: Debt Box: Private Keys
Date: Thursday, August 17, 2023 7:07:00 PM
Attachments: [Wallet Inventory \(8 17 23\)\(12369156.1\).xlsx](#)

Jessica – As discussed, please see the attached asset inventory spreadsheet containing the information requested in the chart you circulated yesterday evening. Thanks.

Alexander R. Yarm

T: [212.735.8734](tel:212.735.8734) | F: [917.522.3134](tel:917.522.3134)

ayarm@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue

27th Floor

New York, NY 10022

www.morrisoncohen.com

From: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>

Sent: Thursday, August 17, 2023 3:44 PM

To: Ross, David E. <dross@morrisoncohen.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>; Hakob Stepanyan <hstepanyan@bdo.com>; Daniel Burget <DBurget@bdo.com>

Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.
--

David,

Thank you for the letter. Regarding the section on DLI's Ecosystem / Tokenomics, I would like to clarify what appear to be a couple misunderstandings between us—if we misunderstand, or if you'd like clarification or elaboration on any of this, let us know.

First, we have not suggested that your clients are actively causing dissipation of assets; we stated that wallet addresses under their control are engaging in automated transactions, resulting in the dissipation of assets due to the burning of gas fees. The funds in the liquidity pool, which it appears they control, are subject to withdrawal by others. In summary, we stated that the dissipation could only be stopped by your clients by turning over control of the assets.

Regarding the process mechanics for the turnover of digital assets, we provided a chart last night that we requested your clients fill out. That is the first step in the process we outlined over the

phone, which is:

- 1. Identify Assets: Via counsel, defendants provide a complete list of wallets in accordance with the chart provided yesterday evening.
- 2. Verify / Validate Assets: Receiver Team will review those wallets to determine contents, characteristics, etc. and confirm/validate same with defendants via their counsel. This work enables the Receiver Team to prepare for the transfers, on a wallet-by-wallet basis, from a Defendant wallet to a Receiver wallet. This work also limits the time/interface required from your clients during the transfer step.
- 3. Transfer Assets: At an agreed time and place, each defendant will initiate a transfer of the underlying assets, on a wallet-by-wallet and defendant-by-defendant basis, from the defendant's wallet to a Receiver's wallet, beginning with small confirming/test transaction(s), all monitored and verified by the parties. We are happy to handle at your local counsel's office, or open to discussing a virtual or temporal-based transfer arrangement if workable for all involved—we are considering if/how it is possible make this work for your clients and the Receiver.
- 4. Confirm Asset Transfer: Receiver confirms delivery from the sending wallet to the Receiver wallet of the previously identified/verified sums of the identified assets. Receiver can provide a form of 'receipt' to a sending defendant, via counsel.

We all agree that the Receiver Team has been pressing for complete compliance with the court's orders, and we also agree that the turnover of digital assets is not something that should be done hastily. It requires careful planning and execution based upon the assets to be transferred – this will differ depending upon the blockchain the assets reside on and the way the assets are protected (single signature/multi-signature/hardware). Thus our protocol is crafted around who will be turning over what (the 'Identify Assets' Step 1). To date, we still do not know what your clients intend to turn over. As such, we must insist they turnover the identities of the public wallet addresses so we can adjust the protocol appropriately to follow a sound, secure process that is in all parties' best interests.

Best,
JM

Jessica Magee | Holland & Knight

Partner

Holland & Knight LLP

One Arts Plaza, 1722 Routh Street, Suite 1500 | Dallas, Texas 75201

Phone 214.969.1375 | Mobile 214.458.4761

jessica.magee@hklaw.com | www.hklaw.com

From: Ross, David E. <dross@morrisoncohen.com>

Sent: Thursday, August 17, 2023 1:05 PM

To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>; Hakob Stepanyan <hstepanyan@bdo.com>; Daniel Burget <DBurget@bdo.com>

Subject: RE: Debt Box: Private Keys

[External email]

Jessica,

Please see the attached.

Thank you.

-Dave

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)

dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue

27th Floor

New York, NY 10022

www.morrisoncohen.com

From: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>

Sent: Wednesday, August 16, 2023 6:46 PM

To: Ross, David E. <dross@morrisoncohen.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>; Hakob Stepanyan <hstepanyan@bdo.com>; Daniel Burget <DBurget@bdo.com>

Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.
--

Yessir, that is on HK's desk and we are at work on it currently. In the meantime, if your folks could fill out and return the below we'll be making progress. This is essentially step 1 of the process—

what is being provided. Thanks!

Public Wallet Address or Exchange	Is the Private Key on Hardware (H) or via Alpha-Numeric Key (A) (if applicable)	Blockchain(s) on which Assets are Hosted	Owner of Digital Asset

From: Ross, David E. <dross@morrisoncohen.com>

Sent: Wednesday, August 16, 2023 5:40 PM

To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>; Hakob Stepanyan <hstepanyan@bdo.com>; Daniel Burget <DBurget@bdo.com>

Subject: RE: Debt Box: Private Keys

[External email]

Hi Jessica,

Good talking with you and your team today.

As you promised, please provide us with the written proposed directives we discussed so that we can review, comment and move forward expeditiously

Thanks!

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)

dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue
27th Floor
New York, NY 10022
www.morrisoncohen.com

----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <Jessica.Magee@hklaw.com>
Date: 8/16/23 3:05 PM (GMT-05:00)
To: "Ross, David E." <dross@morrisoncohen.com>, "Yarm, Alexander R." <ayarm@morrisoncohen.com>, "Gottlieb, Jason" <jgottlieb@morrisoncohen.com>, "Mascianica, Scott (DAL - X62106)" <Scott.Mascianica@hklaw.com>, "Englander, Alex M (WPB - X28339)" <Alex.Englander@hklaw.com>, "Balthazor, Andrew W (MIA - X27584)" <Andrew.Balthazor@hklaw.com>, Hakob Stepanyan <hstepanyan@bdo.com>, Daniel Burget <DBurget@bdo.com>
Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.

Let's all talk at your 3:30pm ET. I will send a Zoom link.

From: Ross, David E. <dross@morrisoncohen.com>
Sent: Wednesday, August 16, 2023 2:02 PM
To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>; Hakob Stepanyan <hstepanyan@bdo.com>; Daniel Burget <DBurget@bdo.com>
Subject: RE: Debt Box: Private Keys

[External email]

Jessica,
Trying to push something off so we can talk at 3:30 my time.
I don't understand. We told you yesterday that is what we were doing and they may already be in transit.

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)
dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue
27th Floor
New York, NY 10022
www.morrisoncohen.com

----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <Jessica.Magee@hklaw.com>

Date: 8/16/23 2:52 PM (GMT-05:00)

To: "Ross, David E." <dross@morrisoncohen.com>, "Yarm, Alexander R." <ayarm@morrisoncohen.com>, "Gottlieb, Jason" <jgottlieb@morrisoncohen.com>, "Mascianica, Scott (DAL - X62106)" <Scott.Mascianica@hklaw.com>, "Englander, Alex M (WPB - X28339)" <Alex.Englander@hklaw.com>, "Balthazor, Andrew W (MIA - X27584)" <Andrew.Balthazor@hklaw.com>, Hakob Stepanyan <hstepanyan@bdo.com>, Daniel Burget <DBurget@bdo.com>

Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.

Apologies for rolling emails—in the meantime, we ask that you/your clients do not drop off/leave anything with Mr. Lewis.

Thanks,
JM

From: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>

Sent: Wednesday, August 16, 2023 1:45 PM

To: Ross, David E. <dross@morrisoncohen.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>; Hakob Stepanyan <hstepanyan@bdo.com>; Daniel Burget <DBurget@bdo.com>

Subject: RE: Debt Box: Private Keys

Thanks, David.

I've added our colleagues at BDO to this thread. When can you speak this afternoon? Given our shared focus on arriving at a sound transfer process, I think we should talk it through again. What timing works for you?

Thanks,

JM

From: Ross, David E. <dross@morrisoncohen.com>

Sent: Wednesday, August 16, 2023 11:45 AM

To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>

Subject: RE: Debt Box: Private Keys

[External email]

Hi Jessica,

As we discussed at length on Saturday, via subsequent substantive emails and during yesterday's Zoom call (which we gladly accepted and participated in on less than 10 minutes notice), we not only wanted to ensure that you have everything you asked for but also, that this highly sensitive information would both be protected and accessible by the Receiver. Indeed, after our Zoom call yesterday we were able to clarify your issues and immediately thereafter expeditiously clarified them with our clients to meet all of your requirements. Put simply, we had already expeditiously gathered all of that information but needed to ensure that delivery not just complied with the TRO but would also remain protected in accordance with same.

As such, in accordance with our (and our clients') extreme diligence, the information you have requested will be available for you to pickup today at 5 PM (mountain time) at our local counsel's office (Matthew Lewis, Esq. of Kunzler Bean & Adamson, 50 West Broadway, Suite 1000, Salt Lake City, Utah 84101. Matt's e-mail and phone are respectively, MLewis@kba.law, (801) 994-4646).

Finally, I would like to understand the basis for your "new concern over possible asset dissipation." Our clients have assured us that is untrue and given that is a very serious allegation, we would request you providing us with the reasons and bases behind that concern.

As always, please let us know if you have any questions or wish to discuss further.

Thank you.

-Dave

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)

dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue

27th Floor

New York, NY 10022
www.morrisoncohen.com

----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <Jessica.Magee@hklaw.com>

Date: 8/16/23 11:15 AM (GMT-05:00)

To: "Ross, David E." <dross@morrisoncohen.com>, "Yarm, Alexander R."

<ayarm@morrisoncohen.com>, "Gottlieb, Jason" <jgottlieb@morrisoncohen.com>, "Mascianica,

Scott (DAL - X62106)" <Scott.Mascianica@hklaw.com>, "Englander, Alex M (WPB - X28339)"

<Alex.Englander@hklaw.com>, "Balthazor, Andrew W (MIA - X27584)"

<Andrew.Balthazor@hklaw.com>

Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.

David,

I am following up on our conversations from yesterday. There is increasing urgency and sensitivity associated with the turnover of private keys, as well as a new concern over possible asset dissipation. I understand you wanted to revisit with your clients yesterday evening to ensure there is clarity about everything they possess and must provide in the form it currently exists. I hope that they've now marshaled that information and are prepared to meet with our expert from BDO to turn everything over—please confirm this is the case or if not, why not. I'm sure you've made explicitly clear to your clients that the court's orders require, among other things, that

- If one or more of them holds, possesses, or controls **any** account passwords, computer passwords, device PINs or passwords, or cryptographic keys, including any such passwords or cryptographic keys **in any manner**
- pertaining in **any way** to **any assets** of **any of the Defendants** (including any digital assets, digital currencies, virtual currencies, digital tokens, cryptocurrencies, digital wallets, or other tangible, intangible, or digital assets of any of the Defendants, wherever located)
- **they must** provide the Receiver **all** passwords, computer passwords, device PINs or passwords, and cryptographic keys in an unencrypted state.

This information was due from your clients several days ago. We must receive everything, and now. I need an exhaustive list of everything they have, the current state in which it exists and will be provided, and we lawyers need to align on providing it to the Receiver as soon as possible.

Without limitation to everything else they possess and must provide, turnover should include the seven addresses you described yesterday and—if not among those—we believe the following:

- 0xBE46815E0F0123ad626B82A0166eaa32274104f5, a PancakeSwap Liquidity Pool that

presently holds ~1,857,716 BSC-USD. DLI wallet address 0x59e984Ae0841c7F0cE5439C7aD3e1d9D9a314857 currently holds 99.8429% of the LP tokens associated with this liquidity pool. Over the past few days, the liquidity pool has devalued by over \$30,000 as a result of ongoing trades. We will need prompt access to the private key to address 0x59e984Ae0841c7F0cE5439C7aD3e1d9D9a314857.

- 0x525d4E10E7903B61188C0D5ce54E281c2448E98c, for which there appears to be an automated script causing this address to exchange DEBT tokens in its wallet with other DEBT Box tokens via PancakeSwap.
- all addresses whose transactions are controlled via an off-chain process or script, along with a description of who controls them and from where.

Please respond to this email as promptly as possible. Again, we are happy to speak by phone/video to the extent you have questions. If we are not able to ensure complete transfer of information, we will need to involve the Court.

Thank you,
JM

From: Ross, David E. <dross@morrisoncohen.com>

Sent: Tuesday, August 15, 2023 4:42 PM

To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>; Balthazor, Andrew W (MIA - X27584) <Andrew.Balthazor@hklaw.com>

Subject: RE: Debt Box: Private Keys

[External email]

Jessica,
Can we get on a call to discuss?

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)

dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue

27th Floor

New York, NY 10022

www.morrisoncohen.com

----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <Jessica.Magee@hklaw.com>

Date: 8/15/23 5:22 PM (GMT-05:00)

To: "Ross, David E." <dross@morrisoncohen.com>, "Yarm, Alexander R."

<ayarm@morrisoncohen.com>, "Gottlieb, Jason" <jgottlieb@morrisoncohen.com>, "Mascianica, Scott (DAL - X62106)" <Scott.Mascianica@hklaw.com>, "Englander, Alex M (WPB - X28339)"

<Alex.Englander@hklaw.com>, "Balthazor, Andrew W (MIA - X27584)"

<Andrew.Balthazor@hklaw.com>

Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.

David,

Thank you for your proposal. However, we have a few issues with some of the terms. Could you advise what multi-signature technology is being used to secure the treasury (Gnosis safe, etc.)? In regards to the crypto assets of Jason Anderson, BLOX Lending, Jacob Anderson, and Roy Nelson, your clients must turn over the private keys and/or cold storage wallets relating to the addresses **where the assets are presently held**. We do not—and cannot—agree to a scenario whereby they move assets—which are subject to the Court’s restraining order—to cold storage for the purposes of turnover. If the assets are held in an exchange, those accounts need to be disclosed along with all we need to access same. Let’s get on the phone/video this afternoon to align if need be. Otherwise, the process to be undertaken involves your local counsel turning over private keys and/or cold storage wallets to a qualified professional at BDO—acting under the Receiver’s direction and authority. BDO can come to your local counsel, or vice versa. I assure you we appreciate the seriousness of the matter and that we have qualified experts ready to receive and safely handle the materials and information from your clients in accordance with the court’s orders.

Thanks,

JM

Jessica Magee | Holland & Knight

Partner

Holland & Knight LLP

One Arts Plaza, 1722 Routh Street, Suite 1500 | Dallas, Texas 75201

Phone 214.969.1375 | Mobile 214.458.4761

jessica.magee@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

From: Ross, David E. <dross@morrisoncohen.com>

Sent: Tuesday, August 15, 2023 2:22 PM

To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>

Subject: RE: Debt Box: Private Keys

[External email]

Jessica,

As a follow-up, below is our proposal to provide you with all passwords and keys to the “wallets” you have requested. We remind you that ensuring that these assets, in the form of seven (7) cold storage wallets --- which are approximately the size of credit cards --- are adequately maintained and secured by the Receiver is paramount. Thus, we appreciate your offer to outline the process for transfer and custody.

First, with regard to the “Treasury” --- which is owned by Dubai entity DCH --- there are 4 keys and 3 of those 4 keys are required to access same. The Treasury is locked with “Nano-X Ledgers” and consists of three (3) cold storage wallets.

Second, defendants Jason Anderson, BLOX Lending, Jake Anderson and Roy Nelson f/b/o DCH (Schad Brannon has no crypto assets) will respectively place all crypto assets into a cold storage wallet (i.e., there will be four (4) such wallets). The holder of the physical cold storage wallet will have access to and control of the crypto assets through a pin number set by defendants and provided with each cold storage wallet. Those cold storage wallets will be from SafePal.

Additionally, all wallet addresses and approximate balances (where applicable) will be documented and provided with each of the cold storage wallets.

To accomplish the “handoff”, we will provide the wallets and physical keys directly to our local counsel, Matthew Lewis, Esq. of Kunzler Bean & Adamson, 50 West Broadway, Suite 1000, Salt Lake City, Utah 84101. Matt’s e-mail and phone are respectively, MLewis@kba.law, [\(801\) 994-4646](tel:(801)994-4646).

You can then arrange to have them picked up at Matt’s offices.

Please confirm that the above is acceptable.

Call me with any questions or concerns.

Thanks!

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)

dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue
27th Floor
New York, NY 10022
www.morrisoncohen.com

----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <Jessica.Magee@hklaw.com>
Date: 8/15/23 12:32 PM (GMT-05:00)
To: "Ross, David E." <dross@morrisoncohen.com>, "Yarm, Alexander R." <ayarm@morrisoncohen.com>, "Gottlieb, Jason" <jgottlieb@morrisoncohen.com>, "Mascianica, Scott (DAL - X62106)" <Scott.Mascianica@hklaw.com>, "Englander, Alex M (WPB - X28339)" <Alex.Englander@hklaw.com>
Subject: RE: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.

We will outline the process for safely transferring custody but will not be entering into an agreement. There is an order to turn the information over, and we are fiduciaries to the court – this is sufficient. Will you be turning over paper documents or hardware? Are there any timeframes that are better or worse for you all to complete the hand off?

Thanks,
JM

From: Ross, David E. <dross@morrisoncohen.com>
Sent: Tuesday, August 15, 2023 11:25 AM
To: Magee, Jessica B (DFW - X61375) <Jessica.Magee@hklaw.com>; Yarm, Alexander R. <ayarm@morrisoncohen.com>; Gottlieb, Jason <jgottlieb@morrisoncohen.com>; Mascianica, Scott (DAL - X62106) <Scott.Mascianica@hklaw.com>; Englander, Alex M (WPB - X28339) <Alex.Englander@hklaw.com>
Subject: RE: Debt Box: Private Keys

[External email]

Hi Jessica,

Thank you for your email. I am sorry I missed your and Scott's call.

As we did with the oil rig information, we are currently expeditiously and diligently working on

transferring all of the "keys" to you. Provided that we will be given a proper agreement as discussed below, this will get done today. I will also provide you with a more concise update within the next couple of hours to narrow down any issues.

In the meantime, as we previously discussed, to ensure that these substantial assets are protected, can you please provide us with a proposed agreement for the handoff and representations as to how they will be secured and handled upon said handoff?

As always, I am available if you and Scott wish to discuss.

Thank you.

-Dave

David E. Ross

Partner

T: [212.735.8841](tel:212.735.8841) | F: [917.522.9941](tel:917.522.9941)

dross@morrisoncohen.com

[vCard](#) | [Bio](#) | [LinkedIn](#)

Morrison Cohen LLP

909 Third Avenue

27th Floor

New York, NY 10022

www.morrisoncohen.com

----- Original message -----

From: "Magee, Jessica B (DFW - X61375)" <Jessica.Magee@hklaw.com>

Date: 8/15/23 11:33 AM (GMT-05:00)

To: "Yarm, Alexander R." <ayarm@morrisoncohen.com>, "Ross, David E."

<dross@morrisoncohen.com>, "Gottlieb, Jason" <jgottlieb@morrisoncohen.com>, "Mascianica,

Scott (DAL - X62106)" <Scott.Mascianica@hklaw.com>, "Englander, Alex M (WPB - X28339)"

<Alex.Englander@hklaw.com>

Subject: Debt Box: Private Keys

CAUTION: External sender. Verify before continuing.

Alex,

Following up on our call a moment ago—please also advise whether transfer will be via paper keys or hardware. David and Jason, for your awareness (David you'll have a voicemail), we need to confirm today the terms for handoff of all private keys to all wallets pertaining in any manner to any assets of any of the defendants, per Sec. IV of the OAR. We believe this is many more than three wallets, as explained to Alex. We are available to hop on the phone as needed today to confirm all of this. We are separately working on a clawback agreement relating to document turnover and a

request letter for other information and materials we need to promptly obtain.

Thanks,
JM

Jessica Magee | Holland & Knight

Partner

Holland & Knight LLP

One Arts Plaza, 1722 Routh Street, Suite 1500 | Dallas, Texas 75201

Phone 214.969.1375 | Mobile 214.458.4761

jessica.magee@hklaw.com | www.hklaw.com

[Add to address book](#) | [View professional biography](#)

NOTE: This e-mail is from a law firm, Holland & Knight LLP ("H&K"), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an

attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>

This transmittal and/or attachment (s) may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error; any review, dissemination, distribution or copying of this transmittal is strictly prohibited. If you have received this transmittal and/or attachment(s) in error, please notify us immediately by reply or by telephone (call us collect at 212-735-8600) and immediately delete this message and all of its attachments. Thank you. We take steps to remove metadata in attachments sent by email, and any remaining metadata should be presumed inadvertent and should not be viewed or used without our express permission. If you receive an attachment containing metadata, please notify the sender immediately and a replacement will be provided.

This email has been scanned for email related threats and delivered safely by Mimecast.
For more information please visit <http://www.mimecast.com>
